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June 12, 2019

VIA ECF

The Honorable Steven C. Mannion, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, New Jersey 07102

Re: *Shire US, Inc. v. Allergan, Inc., et al.*
Civil Action No. 17-7716 (JMV)(SCM)

Dear Judge Mannion:

This firm, together with Haug Partners LLP, represents Plaintiff Shire US, Inc. (“Shire”) in the above-referenced matter. Shire and Defendants Allergan, Inc., Allergan Sales, LLC, and Allergan USA, Inc. (collectively, “Allergan”) hereby jointly submit this letter regarding the status teleconference the Court scheduled for June 20, 2019 at 4:45 p.m. (D.I. 83).

The parties have agreed to the following joint agenda, which lists issues that could be discussed with Your Honor, pursuant to the Court’s Pretrial Scheduling Order (D.I. 36) and the March 12, 2019 Text Order (D.I. 74):

1. Party and Non-Party Discovery To-Date
 - a. Report on productions of party documents to date and what remains to be done.
 - b. Report on the status of non-party discovery.
2. The Parties’ Request to Extend the Deadline for Fact Discovery
 - a. Under the Court’s March 12, 2019 Text Order, fact discovery is to be completed by August 30, 2019 (D.I. 74), but the parties have requested this deadline be extended up to and including April 30, 2020.
 - b. The parties’ reasons for seeking the extension are set forth in their June 12, 2019 letter to Your Honor (D.I. 85).

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The parties look forward to discussing the above issues and any other issues that Your Honor wishes to address. Thank you for Your Honor's kind attention to this matter.

Respectfully yours,

A handwritten signature in blue ink that reads "William C. Baton". The signature is written in a cursive, flowing style.

William C. Baton

cc: Counsel of Record (via e-mail)